

JUDGE CRONAN

25 CV 03496

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORKNesam Abdelzaher

Write the full name of each plaintiff.

____ CV ____
(Include case number if one has been assigned)

-against-

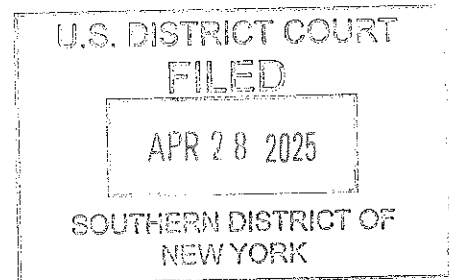
Matt Bridge
Google

COMPLAINT

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.



NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☐ Federal Question

☒ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, Nesam Abdelzaher, is a citizen of the State of
(Plaintiff's name)

New York
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

_____.

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, Matt Bridge, is a citizen of the State of
(Defendant's name)

Georgia

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If the defendant is a corporation:

The defendant, Google, is incorporated under the laws of
the State of California

and has its principal place of business in the State of California

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Wesam M Abdelzaher
First Name Middle Initial Last Name

396 Shepherd Ave APT 5
Street Address

Brooklyn NY 11208
County, City State Zip Code

347-500-7429 wesam.abdelzaher@gmail.com
Telephone Number Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: Matt Bridge
 First Name Last Name
Customer Engineering Manager
 Current Job Title (or other identifying information)
1105 IN Peachtree St. NW
 Current Work Address (or other address where defendant may be served)
Atlanta GA 30309
 County, City State Zip Code

Defendant 2: _____
 First Name Last Name

 Current Job Title (or other identifying information)

 Current Work Address (or other address where defendant may be served)

 County, City State Zip Code

Defendant 3: _____
 First Name Last Name

 Current Job Title (or other identifying information)

 Current Work Address (or other address where defendant may be served)

 County, City State Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIMPlace(s) of occurrence: Virtual Google Hangouts MeetingDate(s) of occurrence: Dec 5, 2024**FACTS:**

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

From years 2021 - 2024, I was approached by Google Technical Sourcers and Recruiters to interview for several positions including Software Engineer and Customer Engineer. In the summer of 2024, I had 2 interview rounds for a Customer Engineer role. The recruiter provided positive feedback over the phone, and informed me that my application will be placed on hold and the role would be going to an internal candidate. My application was later picked up again in October 2024 when the same sourcer reached out to me again regarding another Customer Engineer position. I completed another two interviews, both technical and specific to the role. I received positive feedback yet again, via email, and for the final round I was asked to prepare a

technical presentation of a repeatable and relevant solution. I delivered the presentation (20 minutes + 15 minutes of questions/answers) virtually to Matt Bridge, the hiring manager, and Jimmy Ruiz, Sr. Customer Engineer. I answered all questions and later was declined a job offer without explanation. I proceeded to continue getting certified and applied several times to the same position as well as other open positions within Google that I met the criteria for, and still was rejected every time. I reached out to the recruiters, INJURIES: the hiring manager, via email and linkedIn.

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

(continued on attached paper)

I received and continue to receive psychiatric medical treatment as a result of the repeated systemic abuse caused by Google and its actors.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

\$1,000,000 (one million U.S. Dollars) to relieve monetary burdens caused by discrimination which led to ~~career~~ extended unemployment and longterm career impacts.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

04/26/2025
 Dated
 Wesam
 First Name
 M
 Middle Initial
 Abdelzaher
 Last Name
 Plaintiff's Signature
 396 Shepherd Ave APT 5
 Street Address
 Brooklyn
 County, City
 NY
 State
 11208
 Zip Code
 347-500-7429
 Telephone Number
 wesam.abdelzaher@gmail.com
 Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

Wesley Anderson
04/26/2025

When I reached out to the Google team members, managers and recruiters, I was consistently dismissed and my concerns for my safety were ignored. I faced emotional distress, financial distress due to extended undue unemployment. I wasted months of resources, time, energy towards this job process, resources that could have been spent interviewing with a company with an actual intent to hire. This delayed my employment, cost me experience, promotions, and network.

I feared retaliation for speaking up against Google and its actors - especially since there have been suspected cases of fatal retaliation at the NYC Google offices in 2023.

I experienced blatant discrimination and theft of content of the interview materials requested from me. I was not given any job offer, credit or compensation - and no viable justification was given. I maintain that I was rejected the job offer as a result of implicit bias. I was unaware of my legal right and did not realize I waived my right to defense.

I was interviewed by 3 male presenting employees. I was not accommodated for neurodivergence. I was discriminated for my sex, gender identity, religion, ethnicity and class.